

CASE # 10-14360 3

October 17, 2022

F I L E D  
OCT 28 2022  
CLERK'S OFFICE  
DETROIT

R E C E I V E D  
OCT 20 2022  
DENISE PAGE HOOD  
U.S. DISTRICT JUDGE

Judge Denise Page Hood  
United States District Court for the Eastern District of Michigan  
231 W. Lafayette  
Detroit, Michigan  
48226

RE: The Shane Group v. Blue Cross Blue Shield of Michigan

Dear Judge Hood,

I represent my mother, who is now deceased, in referenced matter. Today, I received a letter from the Settlement Administrator in Portland, Oregon, regarding this matter. In its letter, the Settlement Administrator is asking me to provide explanation of benefits, invoices, evidence of copays and coinsurance and cancelled checks to support my mother's claim. Further, the Settlement Administrator has imposed a deadline of November 5, 2022, to provide these documents.

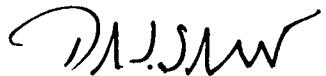
Please treat this communication as my formal objection to the November 5, 2022, deadline. It is simply not possible for a third-party, such as myself, to locate, obtain, review and submit the requested documents in a little over 2 weeks.

Further, this case was filed almost 12 years ago. It seems unreasonable that the lawyers and the Settlement Administrator would drag their feet in this matter during that lengthy time and then expect a party to turn around a substantial request in less than 3 weeks. This challenge is compounded by the fact that neither the lawyers nor the Settlement Administrator has provided a phone number so that questions regarding this request can be timely addressed.

Further, in reviewing my mother's file, I do not see any communication from the Settlement Administrator, or the lawyers, since 2018 regarding the status of this case. Again, to not hear anything for 4 years and then to be required to provide documents on short notice is unreasonable. At the very least, the lawyers or the Settlement Administrator should have provided an update regarding the prospects for recovery. That information is essential, since I have to have some reasonable expectation that my mother's estate will see a significant recovery before I can commit to spending the time to meet the Settlement Administrator's request.

I respectfully request that the Court stay these proceedings until a more reasonable deadline, based on claimants' input, can be established. Thank you.

Respectfully,



Dale J. Schubert  
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Midland, Michigan  
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